

AO 120 (Rev. 3/04)

TO: Mail Stop 8 Director of the U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK
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In Compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been filed in the U.S. District Court Northern District of California on the following Patents or Trademarks: **BZ**

DOCKET NO.	DATE FILED 3/13/2008	U.S. DISTRICT COURT Northern District of California
PLAINTIFF MACROVISION CORPORATION	DEFENDANT UNILOC, USA and UNILOC (SINGAPORE) PRIVATE LIMITED	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 6,202,056	3/13/2001	MACROVISION CORPORATION
2 6,889,206	5/3/2005	MACROVISION CORPORATION
3 7,089,315	8/8/2006	MACROVISION CORPORATION
4 6,802,006	10/5/2004	MACROVISION CORPORATION
5 6,510,516	1/21/2003	MACROVISION CORPORATION

In the above—entitled case, the following patent(s)/ trademark(s) have been included:

DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input checked="" type="checkbox"/> Other Pleading	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	
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In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT Currently Unknown.
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CLERK RICHARD W. WIEKING	(BY) DEPUTY CLERK THELMA NUOVO	DATE MAR 13 2008
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Copy 1—Upon initiation of action, mail this copy to Director Copy 3—Upon termination of action, mail this copy to Director
 Copy 2—Upon filing document adding patent(s), mail this copy to Director Copy 4—Case file copy

1 (a) A declaration that Defendants have directly infringed, actively induced
2 others to infringe and/or contributed to the infringement of United States Patent
3 No. 6,202,056;

4 (b) A declaration that Defendants have directly infringed, actively induced
5 others to infringe and/or contributed to the infringement of United States Patent
6 No. 6,889,206;

7 (c) A declaration that Defendants have directly infringed, actively induced
8 others to infringe and/or contributed to the infringement of United States Patent
9 No. 7,089,315;

10 (d) A declaration that Defendants have directly infringed, actively induced
11 others to infringe and/or contributed to the infringement of United States Patent
12 No. 6,802,006;

13 (e) A declaration that Defendants have directly infringed, actively induced
14 others to infringe and/or contributed to the infringement of United States Patent
15 No. 6,510,516;

16 (f) An award to Plaintiff Macrovision of all available and legally
17 permissible damages caused by Defendants' infringing acts, but in no event less than
18 a reasonable royalty and prejudgment interest thereon;

19 (g) A declaration that Defendants' infringing acts amount to willful patent
20 infringement, and on such basis, an award of damages up to three times the amount
21 of actual damages proven;

22 (h) That the Court enter a preliminary and permanent injunction barring
23 Defendants, its officers, agents, servants, employees and attorneys, alter egos and
24 their successors and assigns, as well as those persons in active concert or
25 participation with them who receive actual notice of the judgment, from infringing,
26 actively inducing the infringement of and/or contributing to the infringement of any
27 claim of the '056 Patent, the '206 Patent, the '315 Patent, the '006 Patent, and the
28 '516 Patent, including but not limited to making, importing, using, offering for sale,

1 or selling any devices or systems that infringe, or using processes that infringe the
2 '056 Patent, the '206 Patent, the '315 Patent, the '006 Patent, and the '516 Patent.

3 (i) A declaration that this case is exceptional under 35 U.S.C. § 285, and
4 on such basis, an award of attorney fees for Plaintiff Macrovision against
5 Defendants;

6 (j) An award to Plaintiff Macrovision of costs, pre-judgment and post-
7 judgment interest; and

8 (k) An award to Plaintiff Macrovision of such other and further legal and
9 equitable relief as this Court deems just and proper.

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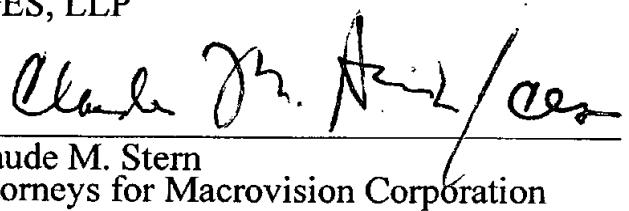
11 DATED: March 13, 2008

Respectfully submitted,

12 QUINN EMANUEL URQUHART OLIVER &
13 HEDGES, LLP

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By


Claude M. Stern
Attorneys for Macrovision Corporation

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JURY DEMAND

Pursuant to Fed. R. Civ. P. 38(b), Macrovision demands a trial by jury on all matters and issues triable by jury.

5 | DATED: March 13, 2008

Respectfully submitted,

**QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP**

BV

Claude M. Stern

Claude M. Stern
Attorneys for Macrovision Corporation

1 QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP
2 Claude M. Stern (Bar No. 96737)
3 claudestern@quinnemanuel.com
4 555 Twin Dolphin Drive, Suite 560
5 Redwood Shores, California 94065-2139
6 Telephone: (650) 801-5000
7 Facsimile: (650) 801-5100

ORIGINAL
FILED

MAR 1 8 2008

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

5 Christopher E. Stretch (Bar No. 166752)
6 chrisstretch@quinnemanuel.com
7 Carl G. Anderson (Bar No. 239927)
8 carlanderson@quinnemanuel.com
9 50 California Street, 22nd Floor
San Francisco, California 94111

E-filing

8 Attorneys for MACROVISION
9 CORPORATION

10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 SAN FRANCISCO DIVISION

14 MACROVISION CORPORATION,

CASE NO.

15 Plaintiff,

COMPLAINT FOR PATENT
INFRINGEMENT

16 vs.

Demand for Jury Trial

17 UNILOC USA, INC. and UNILOC
(SINGAPORE) PRIVATE LIMITED,

Date Filed: March 13, 2008

18 Defendant.

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COPY

COMPLAINT

Plaintiff Macrovision Corporation (hereinafter “Macrovision”), by and through its undersigned attorneys, for its Complaint against Defendants Uniloc USA, Inc. and Uniloc (Singapore) Private Limited (collectively “Uniloc” or “Defendants”) alleges as follows:

JURISDICTION AND VENUE

8 1. This action arises under the patent laws of the United States, 35
9 U.S.C. § 101 et seq. This Court has original jurisdiction over the patent
10 infringement claims in this action under 28 U.S.C. §§ 1331 and 1338(a).

11 2. Venue is established in this judicial district pursuant to 28 U.S.C. §§
12 1391(c) and/or 1400(b).

INTRADISTRICT ASSIGNMENT

3. Pursuant to Civil Local Rule 3-2(c), this action is an Intellectual
Property Action to be assigned on a district-wide basis.

PARTIES

19 4. Macrovision is a California corporation with a principal place of
20 business at 2830 De La Cruz Boulevard, Santa Clara , CA 95050. Macrovision is
21 the owner by assignment of United States Patent Nos. 6,202,056, 6,889,206,
22 7,089,315, 6,802,006, and 6,510,516 (collectively the "Asserted Patents").
23 Macrovision is the owner of all rights to bring suit for infringement of the Asserted
24 Patents.

25 5. Macrovision is informed and believes that Uniloc is a corporation
26 existing under the laws of Rhode Island, and Uniloc (Singapore) Private Limited is
27 a limited liability company existing under the laws of Singapore. Uniloc's global

1 headquarters and principle place of business are located at 3333 Michelson Drive,
2 Suite 600, Irvine, CA 92612.

3 6. Macrovision is informed and believes that Defendant Uniloc conducts
4 substantial business in the State of California and this district; maintains a website
5 on the Internet at <http://redsky.uniloc.com>, which is accessible in this district; and
6 causes and induces infringement in this district.

FACTUAL BACKGROUND

9 7. Macrovision is a global leader in protection, enablement and
10 distribution solutions that empower consumers to discover, acquire, manage and
11 enjoy digital content.

12 8. Macrovision owns all rights, title, and interest in U.S. Patent No.
13 6,202,056 (“the ‘056 Patent”), entitled “Method for Computer Network Operation
14 Providing Basis For Usage Fees”, attached hereto as Exhibit A.

15 9. Macrovision owns all rights, title, and interest in U.S. Patent No.
16 6,889,206 (“the ‘206 Patent”), entitled “Method For Computer Network Operation
17 Providing Basis For Usage Fees”, attached hereto as Exhibit B.

18 10. Macrovision owns all rights, title, and interest in U.S. Patent No.
19 7,089,315 (“the ‘315 Patent”), entitled “Method For Computer Network Operation
20 Providing Basis For Usage Fees”, attached hereto as Exhibit C.

21 11. Macrovision owns all rights, title, and interest in U.S. Patent No.
22 6,802,006 (“the ‘006 Patent”), entitled “System And Method Of Verifying The
23 Authenticity Of Dynamically Connectable Executable Images”, attached hereto as
24 Exhibit D.

25 12. Macrovision owns all rights, title, and interest in U.S. Patent No.
26 6,510,516 (“the ‘516 Patent”), entitled “System and Method for Authenticating
27 Peer Components”, attached hereto as Exhibit E.

1 13. Macrovision has complied with the requirements of 35 U.S.C. Section
2 287(a).

3 14. Defendants, through their SoftAnchor software product have, without
4 license or permission from Macrovision, made, used, offered for sale, sold and/or
5 imported into the United States, and continue to make, use, offer to sell and/or sell
6 software security products and services that directly infringe, induce infringement
7 or contributorily infringe one or more claims of each of the Asserted Patents.

8 15. In light of Macrovision's wide success and renown in the field of
9 protecting enabling and distributing software solutions, and Uniloc's knowledge
10 and awareness of same, Macrovision is informed and believes that, prior to the
11 commencement of this suit and the filing of this complaint, Uniloc was aware of
12 the Asserted Patents and, in conscious disregard of any or all of them, Uniloc
13 knowingly infringed one or more claims of the Asserted Patents.

14

15 **CLAIM I -- PATENT INFRINGEMENT (U.S. PATENT NO. 6,202,056)**

16 16. Plaintiff realleges and incorporates by reference paragraphs 1 through
17 18, inclusive, as though fully set forth in this paragraph.

18 17. Macrovision owns all rights, title, and interest in U.S. Patent No.
19 6,202,056 ("the '056 Patent"), entitled "Method for Computer Network Operation
20 Providing Basis For Usage Fees", attached hereto as Exhibit A. The '056 Patent
21 was duly and legally issued by the United States Patent and Trademark Office on
22 March 13, 2001.

23 18. Defendants have been making, using, offering for sale, selling, or
24 importing into the United States and this District their SoftAnchor product which
25 has directly infringed one or more claims of the '056 Patent.

26 19. Defendants, through their use, manufacture, sale, offering for sale and
27 importing into the United States of their SoftAnchor product have actively induced
28 others to infringe one or more claims of the '056 Patent and/or have contributed to

1 the infringement of one or more of these claims by Defendants' customers and/or
2 their products.

3 20. Defendants are not licensed or otherwise authorized by Macrovision to
4 make, use, offer for sale, sell or import the above identified product which
5 infringes one or more claims of the '056 Patent.

6 21. Defendants' activities render them guilty of infringing one or more
7 claims of the '056 Patent, under 35 U.S.C. § 271.

8 22. By reason of Defendants' infringing activities, Macrovision has
9 suffered substantial damages in an amount to be proven at trial.
10

11 CLAIM II -- PATENT INFRINGEMENT (U.S. PATENT NO. 6,889,206)

12 23. Plaintiff realleges and incorporates by reference paragraphs 1 through
13 25, inclusive, as though fully set forth in this paragraph.

14 24. Macrovision owns all rights, title, and interest in U.S. Patent No.
15 6,889,206 ("the '206 Patent"), entitled "Method For Computer Network Operation
16 Providing Basis For Usage Fees", attached hereto as Exhibit B. The '206 Patent
17 was duly and legally issued by the United States Patent and Trademark Office on
18 May 3, 2005.

19 25. Defendants have been making, using, offering for sale, selling, or
20 importing into the United States and this District their SoftAnchor product which
21 has directly infringed one or more claims of the '206 Patent.

22 26. Defendants, through their use, manufacture, sale, offering for sale and
23 importing into the United States of their SoftAnchor product, have actively induced
24 others to infringe one or more claims of the '206 Patent and/or have contributed to
25 the infringement of one or more of these claims by Defendants' customers and/or
26 their products.
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1 27. Defendants are not licensed or otherwise authorized by Macrovision to
2 make, use, offer for sale, sell or import the above identified product which
3 infringes one or more claims of the '206 Patent.

4 28. Defendants' activities render them guilty of infringing one or more
5 claims of the '206 Patent, under 35 U.S.C. § 271.

6 29. By reason of Defendants' infringing activities, Macrovision has
7 suffered substantial damages in an amount to be proven at trial.
8

9 **CLAIM III -- PATENT INFRINGEMENT (U.S. PATENT NO. 7,089,315)**

10 30. Plaintiff realleges and incorporates by reference paragraphs 1 through
11 32, inclusive, as though fully set forth in this paragraph.

12 31. Macrovision owns all rights, title, and interest in U.S. Patent No.
13 7,089,315 ("the '315 Patent"), entitled "Method For Computer Network Operation
14 Providing Basis For Usage Fees", attached hereto as Exhibit C. The '315 Patent
15 was duly and legally issued by the United States Patent and Trademark Office on
16 August 8, 2006.

17 32. Defendants have been making, using, offering for sale, selling, or
18 importing into the United States and this District their SoftAnchor product which
19 has directly infringed one or more claims of the '315 Patent.

20 33. Defendants, through their use, manufacture, sale, offering for sale and
21 importing into the United States of their SoftAnchor product, have actively induced
22 others to infringe one or more claims of the '315 Patent and/or have contributed to
23 the infringement of one or more of these claims by Defendants' customers and/or
24 their products.

25 34. Defendants are not licensed or otherwise authorized by Macrovision to
26 make, use, offer for sale, sell or import the above identified product which
27 infringes one or more claims of the '315 Patent.
28

1 35. Defendants' activities render them guilty of infringing one or more
2 claims of the '315 Patent, under 35 U.S.C. § 271.

3 36. By reason of Defendants' infringing activities, Macrovision has
4 suffered substantial damages in an amount to be proven at trial.
5

6 **CLAIM IV -- PATENT INFRINGEMENT (U.S. PATENT NO. 6,802,006)**

7 37. Plaintiff realleges and incorporates by reference paragraphs 1 through
8 39, inclusive, as though fully set forth in this paragraph.

9 38. Macrovision owns all rights, title, and interest in U.S. Patent No.
10 6,802,006 ("the '006 Patent"), entitled "System And Method Of Verifying The
11 Authenticity Of Dynamically Connectable Executable Images", attached hereto as
12 Exhibit D. The '006 Patent was duly and legally issued by the United States Patent
13 and Trademark Office on October 5, 2004.

14 39. Defendants have been making, using, offering for sale, selling, or
15 importing into the United States and this District their SoftAnchor product which
16 has directly infringed one or more claims of the '006 Patent.

17 40. Defendants, through their use, manufacture, sale, offering for sale and
18 importing into the United States of their SoftAnchor product, have actively induced
19 others to infringe one or more claims of the '006 Patent and/or have contributed to
20 the infringement of one or more of these claims by Defendants' customers and/or
21 their products.

22 41. Defendants are not licensed or otherwise authorized by Macrovision to
23 make, use, offer for sale, sell or import the above identified product which
24 infringes one or more claims of the '006 Patent.

25 42. Defendants' activities render them guilty of infringing one or more
26 claims of the '006 Patent, under 35 U.S.C. § 271.

27 43. By reason of Defendants' infringing activities, Macrovision has
28 suffered substantial damages in an amount to be proven at trial.

1 **CLAIM V -- PATENT INFRINGEMENT (U.S. PATENT NO. 6,510,516)**

2 44. Plaintiff realleges and incorporates by reference paragraphs 1 through
3 46, inclusive, as though fully set forth in this paragraph.

4 45. Macrovision owns all rights, title, and interest in U.S. Patent No.
5 6,510,516 ("the '516 Patent"), entitled "System and Method for Authenticating
6 Peer Components", attached hereto as Exhibit E. The '516 Patent was duly and
7 legally issued by the United States Patent and Trademark Office on January 21,
8 2003.

9 46. Defendants have been making, using, offering for sale, selling, or
10 importing into the United States and this District their SoftAnchor product which
11 has directly infringed one or more claims of the '516 Patent.

12 47. Defendants, through their use, manufacture, sale, offering for sale and
13 importing into the United States of their SoftAnchor product, have actively induced
14 others to infringe one or more claims of the '516 Patent and/or have contributed to
15 the infringement of one or more of these claims by Defendants' customers and/or
16 their products.

17 48. Defendants are not licensed or otherwise authorized by Macrovision to
18 make, use, offer for sale, sell or import the above identified product which
19 infringes one or more claims of the '516 Patent.

20 49. Defendants' activities render them guilty of infringing one or more
21 claims of the '516 Patent, under 35 U.S.C. § 271.

22 50. By reason of Defendants' infringing activities, Macrovision has
23 suffered substantial damages in an amount to be proven at trial.

25 **PRAAYER FOR RELIEF**

26 Wherefore, Plaintiff Macrovision respectfully prays for judgment against
27 Defendants as follows: